

COCKET FILE COPY ORIGINAL

7852 Walker Drive, Suite 200 Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi@jsitel.com

October 10, 2013

ACCEPTED/FILED

OCT 2 4 2013

Federal Communications Commission
Office of the Secretary

By Hand Delivery

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Re: WC

WC Docket No. 10-90, WC Docket No. 11-42

2013 ETC Annual Report of Ardmore Telephone Company, Inc.

Study Area Code 290280

Dear Ms. Dortch:

On behalf of Ardmore Telephone Company, Inc. "Ardmore", JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules. Ardmore seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information. The redacted version is also being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely.

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd 043
List ABCDE

¹ 47 C.F.R. §§ 54.313, 54.422.

² Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

	m 481 - Carrier Annual Reporting	19.30g	FCC Form 481 OMB Control N July 2013	a. 3060-0986/UNIS Central No. 3060-0819
<010>	Study Area Code	290280		
<015>	Study Area Name	ARDMORE TEL CO		
<020>	Program Year	2014		ACCEPTED/FILED
<030>	Contact Name: Person USAC should contact with questions about this data	Todd Crandall		OCT 2 4 2013
<035>	Contact Telephone Number: Number of the person identified in data line <030	270-856-9983 >		Federal Communications Commission Office of the Secretary
<039>	Contact Email Address: Email of the person identified in data line <030>	tcrandall@tmsvcs	. com	Office of the Secretary
ANNUA	AL REPORTING FOR ALL CARRIERS			54.313 54.422 Completion Required (check box when complete)
<100>	Service Quality Improvement Reporting		(complete attached worksheet)	(check box when complete)
<200> <210>	<u> </u>	no outages to report	(complete attached worksheet)	V V
<310>	Unfulfilled Service Requests (voice) Detail on Attempts (voice) Unfulfilled Service Requests (broadband) Detail on Attempts (broadband)	0	(attach descriptive document)	
<400><410><420><430><440><450><	Number of Complaints per 1,000 customers (voice Fixed Mobile Number of Complaints per 1,000 customers (broat Fixed Mobile			
<1000> <1010> <1100> <1110>	Service Quality Standards & Consumer Protection 290280tn510 Functionality in Emergency Situations 290280tn610 Company Price Offerings (voice) Company Price Offerings (broadband) Operating Companies and Affiliates Tribal Land Offerings (Y/N)? Voice Services Rate Comparability Terrestrial Backhaul (Y/N)? Terms and Condition for Lifeline Customers	Rules Compliance	(check to indicate certification) (attached descriptive document) (check to indicate certification) (attached descriptive document) (complete attached worksheet) (complete attached worksheet) (complete attached worksheet) (check to indicate certification) (attach descriptive document) (if not, check to indicate certification) (complete attached worksheet) (complete attached worksheet)	
<2000> <2005> <3000> <3005>	Price Cap Carriers, Proceed to <u>Price Cap Additions</u> Including Rate-of-Return Carriers affiliated with Price Cap Additions Rate of Return Carriers, Proceed to <u>ROR Addition</u>	ice Cap Local Exchang	ge Carriers (check to indicate certification) (complete attached worksheet)	

	ervice Quality Improvement Reporting illection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	0280
<015>	Study Area Name AR	RDMORE TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line	<030> ²⁷⁰⁻⁸⁵⁶⁻⁹⁹⁸³
<039>	Contact Email Address - Email Address of person identified in data line	<030> tcrandall@tmsvcs.com
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a)	
<111>	year plan" filed with the FCC?	(yes / no) U
<112>	If your answer to Line <111> is yes, then you are required to file a progreport, on line <112> delineating the status of your company's existing 54.202(a) "5 year plan" on file with the FCC, as it relates to your provisivoice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). ICETC which only receives frozen support, your progress report is only	§ ion of ears,
	required to address voice telephony service.	
	Please check these boxes below to confirm that the attached PDF, on li 112, contains a progress report on its five-year service quality improve plan pursuant to § 54.202(a). The information shall be submitted at the center level or census block as appropriate.	ment
<113>	Maps detailing progress towards meeting plan targets	
<114>	Report how much universal service (USF) support was received	
<115>	How (USF) was used to improve service quality	
<116>	How (USF)was used to improve service coverage	
<117>	How (USF) was used to improve service capacity	
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	
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<010>	Study Area Code	290280						
<015>	Study Area Name	ARDMORE TEL CO						
<020>	Program Year	2014						
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall						
<035>	Contact Telephone Number - Number of person identified in data line <030> 270-856-9983							
<039>	<039> Contact Email Address - Email Address of person identified in data line <030> tcrandall@tmsvcs.com							

<220>

<a>-	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	_ <d></d>	<e></e>	<f></f>	<g></g>	<h></h>
NORS									Did This Outage		
Reference		Outage Start		Outage End	Number of		911 Facilities	Service Outage	Affect Multiple		
Number	Date	Time	Date	Time	Customers Affected	Total Number of	Affected	Description (Check	Study Areas	Service Outage	Preventative
ļ						Customers	(Yes / No)	all that apply)	(Yes / No)	Resolution	Procedures
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	ce Offerings including Voice Rate Data lection Form	The first divine States of the state of the	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	290280	
<015>	Study Area Name	ARDMORE TEL CO	
<020>	Program Year	2014	
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall	
<035>	Contact Telephone Number - Number of person identified in data line <030>	270-856-9983	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmsvcs.com	
<701>	Residential Local Service Charge Effective Date 1/1/2013		
<702>	Single State-wide Residential Local Service Charge		

<703>	∛ā1>	√a2>	<a3></a3>	4 b1>		- 63× 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	<64>11		<c> <c> < < < < < < < < < </c></c>
	!				Residential Local			Mandatory Extended Area	
	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fee
	L		<u> </u>					,	
									
	<u> </u>								
			<u> </u>					<u> </u>	<u> </u>
					- See att	ached worksheet			
					Oce all	aciled worksheet			
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- 134	adband Price Offerings ection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	290280
<015>	Study Area Name	ARDMORE TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <0.	30> 270-856-9983
<039>	Contact Email Address - Email Address of person identified in data line <0	30> tcrandall@tmsvcs.com

11>	<a1></a1>	<a2></a2>	(bi>	kb2>	<c> <c> <c></c></c></c>	<d1> 2</d1>	≺d2×	<d3></d3>	ç ≪dá> □
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (<i>select</i>)
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	erating Companies lection Form				The state of the s	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code		290280			
<015>	Study Area Name		ARDMORE TEL CO			
<020>	Program Year		2014			
<030>	Contact Name - Person	USAC should contact regarding this data	Todd Crandall			
<035>	Contact Telephone Num	ber - Number of person identified in data line <	030> 270-856-9983			
<039>	Contact Email Address -	Email Address of person identified in data line <	030> tcrandall@tmsvcs.co	om		
<810>	Reporting Carrier	Ardmore Telephone Company, Inc.				
<811>	Holding Company	Synergy Technology Partners, Inc.		·		
<812>	Operating Company	Ardmore Telephone Company, Inc.				

<813>	e vals	- *** ********************************	<á3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	See a	ttached works	heet
		<u> </u>	
			
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A CHARLES TO SECURITY TO SECURITY	oal Lands Reporting ection Form	FCC Form 481 OMB Control No.: 3060-0986/OMB Control No.: 3060-0819
一声 "事"的		July 2013
<010>	Study Area Code	290280
<015>	Study Area Name	ARDMORE TBL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line	e <030> 270-856-9983
<039>	Contact Email Address - Email Address of person identified in data line	e <030> tcrandall@tmsvcs.com
<910>	Tribal Land(s) on which ETC Serves	
<920>	Tribal Government Engagement Obligation	Name of Attached Document (.pdf)
		Name of Attached Document (.pdr)
	If your company serves Tribal lands, please select (Yes,No, NA) for	
	each these boxes to confirm the status described on the attached	
	PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:	
		Select
		(Yes,No,
		NA)
<921>	Needs assessment and deployment planning with a focus on Tribal	
	community anchor institutions;	
<922>	Feasibility and sustainability planning;	
<923>	Marketing services in a culturally sensitive manner;	
<924>	Compliance with Rights of way processes	
<925>	Compliance with Land Use permitting requirements	
<926>	Compliance with Facilities Siting rules	
<927>	Compliance with Environmental Review processes	
<928>	Compliance with Cultural Preservation review processes	
<929>	Compliance with Tribal Business and Licensing requirements.	

	o Terrestrial Backhaul Reporting ection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	290280
<015>	Study Area Name	ARDMORE TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <030>	270-856-9983
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmsvcs.com
<1120>	Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)	
<1130>	Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)	

Lifeline	ection Form	FEC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	290280
<015>	Study Area Name	ARDMORE TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data I	ne <030> ²⁷⁰⁻⁸⁵⁶⁻⁹⁹⁸³
<039>	Contact Email Address - Email Address of person identified in data	ine <030> tcrandall@tmsvcs.com
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	290280tn1210
		Name of attached document (.pdf)
<1220>	Link to Public Website	HTTPhttp://ardmore.net/userfiles/media/lifeline.jpg
	"Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:	
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	
<1222>	Details on the number of minutes provided as part of the plan,	
<1223>	Additional charges for toll calls, and rates for each such plan.	

Data Coll	ke Gap Carrier Additional Documentation ection Form Rate-of-Return Corders offilioted with Price Cap Local Exchange Carriers	The state of the s	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	90280	
<015>		RDMORE TEL CO	
<020>		014	
<030>		odd Crandall	
<035>	Contact Telephone Number - Number of person identified in data line <030>	270-856-9983	
<039>	Contact Email Address - Email Address of person identified in data line <0302	tcrandall@tmsvcs.com	
CHECK th	ne boxes below to note compliance as a recipient of incremental Connect Am support as set forth in 47 CFR § 54.313(b),(c),(d	rica Phase I support, frozen High Cost support, High Cost support to (e) the information reported on this form and in the documents atta	The state of the s
	Incremental Connect America Phase I reporting		
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}		
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}		
	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a)		
<2012>	2013 Frozen Support Certification		
<2013>	2014 Frozen Support Certification		
<2014>	2015 Frozen Support Certification		· [=1
<2015>	2016 and future Frozen Support Certification		
<2016>	Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d)) Certification Support Used to Build Broadband		
	Connect America Phase II Reporting (47 CFR § 54.313(e))		
<2017>	3rd year Broadband Service Certification		
<2017>	5th year Broadband Service Certification		├─ ┤
<2019>	Interim Progress Certification		
<2020>	Please check the box to confirm that the attached PDF, on line 2021		
12020>	contains the required information pursuant to § 54.313 (e)(3)(ii), as a	recipient	
	of CAF Phase II support shall provide the number, names, and address	·	
	community anchor institutions to which began providing access to be		
	service in the preceding calendar year.		
<2021>	Interim Progress Community Anchor Institutions	Name of Attached Document Listing Required Information	·

	rte Of Rehim Carrier Additional Documentation ection Form		PCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
- <010>	Study Area Code 290280		
<015>	Study Area Name ARDMORE	TEL CO	
<020>	Program Year 2014		
<030>		dd Crandall	
<035>	Contact Telephone Number - Number of person identified in data line <030>	270-856-9983	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmsvcs.com	
CHECK t	he boxes below to note compliance on its five year service quality plan (pursu CFR § 54.313(f)(2), I further certify that	ant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring of the information reported on this form and in the documents attach	
	Progress Report on 5 Year Plan	\	
(3010)	Milestone Certification (47 CFR \S 54.313(f)(1)(i)) Please check this box to confirm that the attached PDF , on line 3012,	Name of Attached Document Listing Required Information	
(3011)	contains the required information pursuant to § 54.313 (f)(1)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.		
(3012) (3013) (3014)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii)) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) If yes, does your company file the RUS annual report Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for	Name of Attached Document Listing Required Information	(Yes/No) (Yes/No)
(3015)	Telecommunications Borrowers) PDF of Balance Sheet, Income Statement and Statement of Cash Flows		
(,	•		
(3017) (3018)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation If the response is no on line 3014, Is your company audited?	Name of Attached Document Listing Required Information	√ (Yes/No)
	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains		
(3019)	: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications PDF of Balance Sheet, Income Statement and Statement of Cash Flows		
(3020)	Management letter issued by the independent certified public accountant that performed the company's financial audit.		
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, Underlying information subjected to a review by an independent certified public accountant		
(3024)	Underlying information subjected to an officer certification.		
(3025)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	290280tn3026

Course Section 11 Course 12	tion - Reporting Carri ection Form	er FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	290280
<015>	Study Area Name	ARDMORE TEL CO
<020>	Program Year	2014
<030>	Contact Name - Perso	on USAC should contact regarding this data Todd Crandall
<035>	Contact Telephone N	umber - Number of person identified in data line <030> 270-856-9983
<039>	Contact Email Addres	ss - Email Address of person identified in data line <030> tcrandall@tmsvcs.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

certify that I am an officer of the reporting carrier; my respond recipients; and, to the best of my knowledge, the information	onsibilities include ensuring the accuracy of the annual reporting r n reported on this form and in any attachments is accurate.	equirements for universal service support
Name of Reporting Carrier:		
Signature of Authorized Officer:		Date
Printed name of Authorized Officer:		
Title or position of Authorized Officer:		
Telephone number of Authorized Officer:		
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	

100000000000000000000000000000000000000	ion - Agent / Carrier ection Form	And Control of the Co			FCC Form 481 QMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	
<010>	Study Area Code	290280				
<015>	Study Area Name	ARDMORE TEL CO				
<020>	Program Year	2014				
<030>	Contact Name - Person L	JSAC should contact regarding this data	Todd	Crandall		
<035>	Contact Telephone Num	ber - Number of person identified in data lin	e <030>	270-856-9983		
<039>	Contact Email Address -	Email Address of person identified in data lin	ne <030>	tcrandall@tmsvcs.com		

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

I certify that (Name of Agent) revor Bonnstetter is authorized to submit the information reported on behalf of the reporting carrier. also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.				
Name of Authorized Agent: Trevor Bonnstetter				
Name of Reporting Carrier: ARDMORE TEL CO				
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 10/10/2013			
Printed name of Authorized Officer: Trevor Bonnstetter				
Title or position of Authorized Officer: CEO				
Telephone number of Authorized Officer: 931.473.2517				
Study Area Code of Reporting Carrier: 290280	Filing Due Date for this form: 10/15/2013			

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier				
, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on bel he data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported here		- · · · · · · · · · · · · · · · · · · ·		
lame of Reporting Carrier: ARDMORE TEL CO				
ame of Authorized Agent or Employee of Agent: John Staurulakis, Inc.				
ignature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date:	10/10/2013		
rinted name of Authorized Agent or Employee of Agent: Alice Lewis				
tle or position of Authorized Agent or Employee of Agent Manager				
elephone number of Authorized Agent or Employee of Agent: 217-498-6863				
tudy Area Code of Reporting Carrier: 290280 Filing Due Date for this form: 10/15/2013				
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 18 of the United States Code, 18 U.S.C. § 1001.	502, 503(b), or	fine or imprisonment under Title		

Attachments

Ardmore Telephone Co., Inc.'s demonstration of complying with applicable service quality standards and consumer protection rules:

In establishing this certification in its 2005 ETC Order,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." ² The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis. ³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement." ⁴

Ardmore Telephone Co., Inc. ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the Rules of Tennessee Regulatory Authority, Chapter 1220-4-1-.03 and the Tennessee Code Annotated, Title 65, Chapter 5, Part 1, §65-5-102, which disclose rates, terms and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers which require implementation of Basic

¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

² *Id.* at para. 28.

³ Id. The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." Id. at n. 71.

Utility Obligations in accordance with the Rules of Tennessee Regulatory Authority, Chapter 1220-4-2-.29, Consumer Safeguards as identified in the Rules of Tennessee Regulatory Authority, Chapter 1220-4-2-.55, anti-slamming procedures as required in the Rules of Tennessee Regulatory Authority, Chapter 1220-4-2-.56; (3) truth-in-billing requirements in accordance with the Rules of Tennessee Regulatory Authority, Chapter 1220-4-2-.58; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

Ardmore Telephone Co., Inc.'s demonstration of complying with applicable service quality standards and consumer protection rules:

In establishing this certification in its 2005 ETC Order,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." ² The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis. ³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."

Ardmore Telephone Co., Inc. ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Alabama Public Service Commission's Rules and Regulations, Telephone Rules, Rule T-12, Filing of Telephone Tariffs and The Code of Alabama 1975 Section 37-1-81, which disclose rates, terms and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers

¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

² *Id.* at para. 28.

³ Id. The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." Id. at n. 71.

which require adherence to minimum service standards as identified in the Alabama Public Service Commission's Rules and Regulations, Telephone Rules, Rule T-21, protection against cramming and other deceptive practices as identified in Rule T-16(C)(11); (3) truth-in-billing requirements as identified in Rule T-16; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

Ardmore Telephone Co. Inc. offers the following as examples of how it meets the service quality and consumer protection requirements. Ardmore maintains and updates appropriate tariffs with all rates, terms, and conditions on file with the Alabama Public Service Commission and maintains a copy of such tariff for public inspection at Company offices. Ardmore also sends all required bill messages and/or customer notifications, including but not limited to, do-not call list, cramming, truth-in billing, Low Income Support/Lifeline, etc. Ardmore maintains a CPNI Manual and Red Flag Manual. Ardmore also prepares and maintains monthly trouble reports which are available upon request to the Alabama Public Service Commission.

Ardmore Telephone Co., Inc.'s Ability to Function in Emergency Situations

Ardmore Telephone Co., Inc. ("Company") hereby certifies that it is able to function in emergency situations as set forth in Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and Rules of the Tennessee Regulatory Authority, Chapter 1220-4-2. The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

In accordance with the Rules of Tennessee Regulatory Authority, Chapter 1220-4-2, 1220-4-2-.23 Emergency Operation, the Company's central offices have adequate provision for emergency power. Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic.

Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

Ardmore Telephone Co., Inc.'s Ability to Function in Emergency Situations

Ardmore Telephone Co., Inc. hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and the Alabama Public Service Commission Rules and Regulations, Telephone Rules. The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company's central office(s) that have twenty-four (24) hour maintenance coverage or have an automatic start engine alternator can provide a minimum of three (3) hours of batter reserve in accordance with the Alabama Public Service Commission Rules and Regulations, Telephone Rules, Rule T-21(L)(2). All other central office(s), as and if

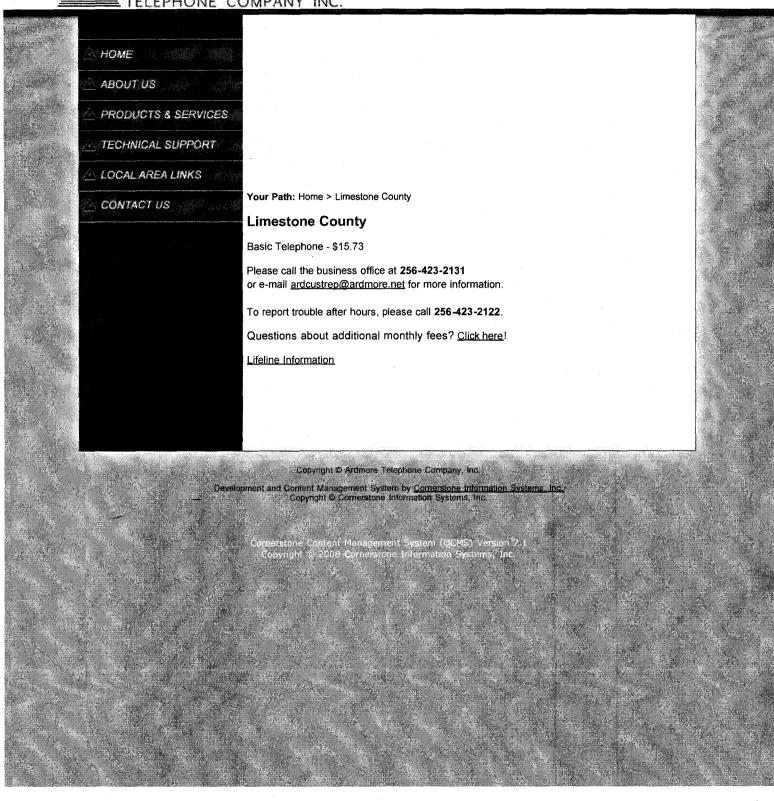
Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

applicable, have a minimum of eight (8) hours of battery reserve In accordance with Rule T-21(L)(2).

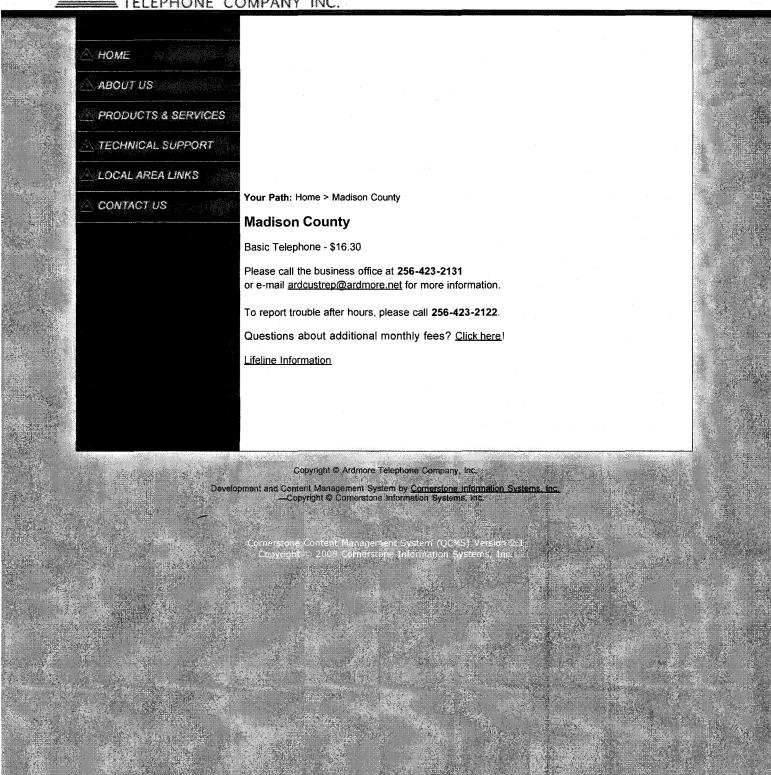
Each central office building is equipped with battery back-up. Generators are available for additional back-up until power is restored based on available fuel source. An emergency maintenance program is activated during times of power outage in order to keep phone service operational to Ardmore Telephone Co. Inc. customers.



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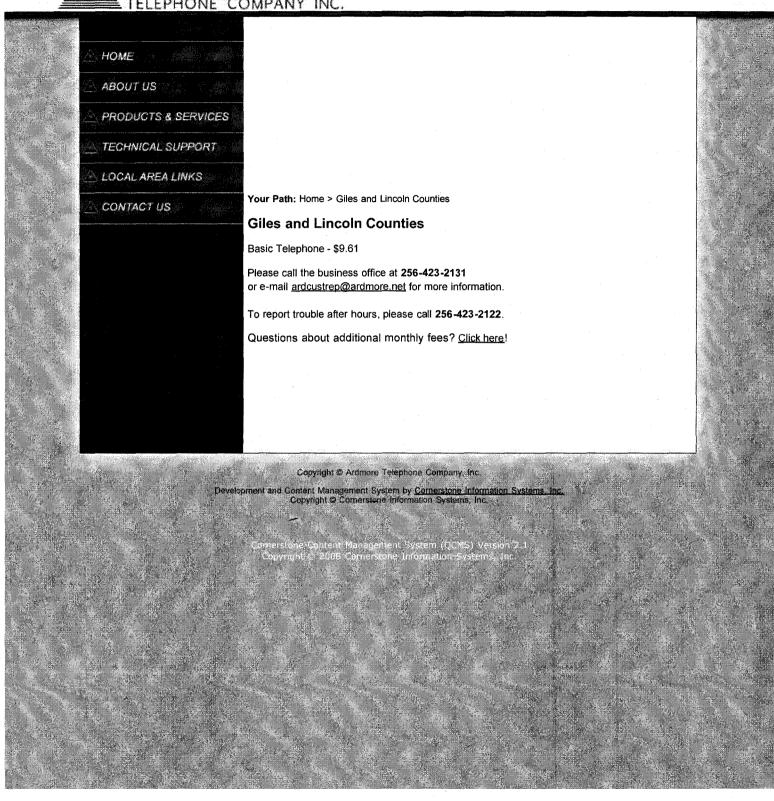






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Ardmore Telephone Company - Tennessee

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BASIC LOCAL EXCHANGE SERVICE

S2.15 LIFELINE ASSISTANCE PROGRAM

1. General

Lifeline Assistance reduces an eligible customer's monthly rates for local service. The total monthly credit to the local telephone service bill of qualified residential subscribers consists of a federal credit totaling no more than \$9.25. The credits are applied to the local service bills for qualified recipients of low income assistance programs who are eligible and apply for the credits. Lifeline Assistance may be applied to a maximum of one line per eligible customer.

2. Regulations

- a. Persons wishing to qualify for the credit must meet state certification criteria for eligibility. This credit is available only to residence customers. Eligibility is determined by participation in one of the below programs, or by having a household income at or below 135% of the federal poverty level.
 - i. Medicaid
 - ii. Food Stamps
 - iii. Supplemental Social Security
 - iv. Federal Public Housing Assistance
 - v. Low Income Home Energy Assistance Program
 - vi. National School Free Lunch Program
 - vii. Temporary Assistance for Needy Families
- b. All applicants for this service are subject to verifications of eligibility with the state agencies responsible for administration of the qualifying programs, or in the alternative provide adequate documentation to WK&T. WK&T will inspect but not retain a copy of those documents.
- c. The Company will periodically reconcile and confirm the continuing eligibility of Lifeline Assistance recipients with the appropriate state agencies and through surveys requiring customers to verify their continuing eligibility for Lifeline Assistance. Upon a determination of ineligibility, the Company will contact the customer and request documentation of eligibility. If the customer can not provide such documentation within sixty (60) days from the date of such request, the credit will be discontinued on the bill after written notification to the customer. All unresolved disputes regarding eligibility shall be brought to the attention of the Commission for resolution.

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d. The Company will process all applications and apply the appropriate credit on the customer's next monthly bill. A secondary service charge is not applicable for existing customers who subscribe to Lifeline Assistance.

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- e. As a participant in Lifeline Assistance, customers are eligible to receive Toll Limitation Service at no charge. This service will only be provided at the customer's request
- f. Local service deposit requirements will be waived for customers who voluntarily receive Toll Limitation Service.
- g. Participants in Lifeline Assistance shall not be disconnected from Local Service for nonpayment of toll charges. In addition, the Company will not deny re-establishment of local service to customers who are eligible for Lifeline Assistance and have previously been disconnected for nonpayment of toll charges. The Company may require customers whose households are otherwise eligible who have previously unpaid toll charges to subscribe to toll blocking prior to being accepted as eligible for Lifeline service. Lifeline Assistance will not be connected if an outstanding balance is owed by the customer for local service.
- h. Partial payments that are received from Lifeline customers will first be applied to local service charges and then to any outstanding toll charges.
- i. One low income credit is available per household and is applicable to the primary residential connection only.
- j. A Lifeline customer may subscribe to any local service offering available to other residential customers.
- k. The customer must also certify that no other person at the address on the service order below is receiving any other Lifeline benefits.
- 1. The customer is to immediately inform the Company upon the cessation of any eligibility.

3. Credits

- 1. The customer will receive a \$9.25 monthly credit for local exchange telephone service. (R)
- 2. All other customary rates, taxes, and other taxes apply.

General Subscriber Services Tariff

Issued: March 29, 2012 Effective: April 1, 2012

By: Trevor R. Bonnstetter Chief Executive Officer

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2nd Revised Sheet 5

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ARDMORE TELEPHONE COMPANY, INC. (SAC 290280) ATTACHMENT - LINE 3017 ATTACHMENT REDACTED IN ENTIRETY